

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HOMeward RESIDENTIAL, INC.,
solely in its capacity as Master Servicer
for the Option One Mortgage Loan Trust
2006-2, for the benefit of the Trustee and
the holders of Option One Mortgage Loan
Trust 2006-2 Certificates,

Plaintiff,

- against -

SAND CANYON CORPORATION, f/k/a
Option One Mortgage Corporation,

Defendant.

12-cv-05067 (JMF)

DECLARATION OF WALTER TOROUS, PH.D

1. I am a Senior Lecturer at the Massachusetts Institute of Technology with a joint position at the Center for Real Estate and the Sloan School of Management.

2. As part of my role as expert in the above-captioned matter, counsel for Defendant Sand Canyon Corporation (“SCC”) asked me to review and respond to the proffered expert reports of Homeward Residential (“Homeward”). Specifically, I was asked to respond to the Report of Dr. Joseph R. Mason, dated June 15, 2018, and the Reports of Karl N. Snow, Ph.D, dated June 15, 2018, June 27, 2018, and March 29, 2019.

3. Employees at the Analysis Group Inc. (“AGI”), working under my direction and supervision, assisted me with my work on this matter.

4. On May 31, 2019, I produced an Expert Report in this matter (“Report”).

5. Proprietary data underlying my damages calculations and statistical software codes that create those data sets and perform my damages calculations; data regarding mortgage origination and securitization volumes.

6. Exhibit 862 contains detailed descriptions of AGI's proprietary code and data processing programs.¹

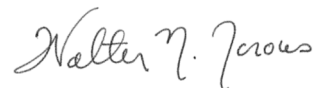
7. AGI's proprietary code is based on valuable intellectual property that AGI keeps confidential from its competitors.

8. Customers pay AGI, in part, because of its proprietary code and data inputs.

9. Because the material in Exhibit 862 provides detailed information concerning the workings and performance of AGI's proprietary software code and would, if made public, harm AGI's ability to compete, AGI believes it is essential to its business that that material also be kept confidential.

10. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 13, 2021



Walter Torous, Ph.D.

¹ Specifically, the documents located in para. 37 (FN 50), and sub-exhibits 10-14, 23-29 and the "Program" folder as outlined on pages 16-17 of SCC's Response to the Court's Show Cause Order (ECF No. 395).